REMARKS

The present application was filed on September 29, 2003 with claims 1 through 20. Claims 1 through 20 are presently pending in the above-identified patent application.

This amendment is submitted pursuant to 37 CFR §1.116 and should be entered. The Amendment places all of the pending claims, i.e., claims 1-11, in a form that is believed allowable, and, in any event, in a better form for appeal. It is believed that examination of the pending claims as amended, which are consistent with the previous record herein, will not place any substantial burden on the Examiner. *Applicants note that the Examiner has already considered this precise amended limitation in the original Office Action, when considering the rejection of, for example, claim 7*

In the Office Action, the Examiner rejected claims 1, 5, 9, 13, 16 and 18 under 35 U.S.C. §102(e) as being anticipated by Ramaswamy et al. (United States Patent Number 6,490,560), rejected claims 2, 3, 6, 10, 11, 14, and 19 under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., as applied to claims 1, 9, and 16 above, and further in view of Honarvar et al. (United States Patent Application Publication Number 2003/0154406), rejected claims 4, 7, 12, 15, 17, and 20 under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., as applied to claims 1, 9, and 16 above and further in view of August (United States Patent Application Publication Number 2002/0094067), and rejected claim 8 under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., as applied to claim 1 above, and further in view of Arnold (United States Patent Application Publication Number 2002/0147914)

Independent Claims 1, 9 and 16

Independent claims 1, 9, and 16 were rejected under 35 U.S.C. §102(e) as being anticipated by Ramaswamy et al. Regarding claim 1, the Examiner asserts that Ramaswamy teaches processing spoken answers to said one or more questions using an automatic speech recognition technique (col. 4, lines 15-20).

Voice Verification Versus Content Analysis

Applicants note that Ramaswamy teaches a "system for verifying user identity, in accordance with the present invention, includes a conversational system for receiving inputs from a user and *transforming the inputs into formal commands*." (Col. 1, lines 45-48.) Ramaswamy employs conventional biometric information, such as a voice signature (voice print) based on

conventional *voice* verification. Ramaswamy does not process the spoken answers to confirm the correctness of the spoken content. The present invention performs verification based on what the user *knows*, not based on the user's voice print.

At col. 4, lines 51-64, Ramaswamy describes two conventional verification systems, one based on voice signature (or voice print, representing the inherent characteristics of the speaker's articulatory apparatus, not what the speaker *knows*) and the other the conventional password based system. Individually, they are well known prior art as the description indicates. Ramaswamy does not, however, teach performing verification with verbal/spoken content.

Thus, Ramaswamy does *not* disclose or suggest processing spoken answers to one or more questions using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*, as required by each independent claim, as amended.

Additional Cited References

Honarvar was also cited by the Examiner for its disclosure that, in order to develop a confidence score, a vendor determines the points for each authentication question to derive predictive confidence scores. Applicants note that Hornarvar teaches "authenticating the user involves generating automatically authentication questions based upon the parameters and the user data, querying the user with the generated authentication questions, and determining an authentication result based upon the parameters and data input by the user in response to the queries." (Paragraph [0041].) Hornarvar also teaches that "the authentication engine 240 generates an *XML authentication question and answer set* for the user." (Paragraph [0136]; emphasis added.) Hornarvar, however, does *not* address the issue of processing *spoken answers to questions* using an automatic speech recognition technique.

Thus, Hornarvar et al. do not disclose or suggest processing spoken answers to said one or more questions using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*, as required by independent claims 1, 9, and 16, as amended.

August was also cited by the Examiner for its disclosure that teaches a speech processing unit that includes an Utterance Verification/Verbal Information Verification (VIV) application. Applicant notes that August is directed to a "method for network-based speech

recognition of subscriber (or 'user') voice-commands for invoking call information and management features and text-to-speech translation of call information and call management features." (Paragraph [0002].) August, however, does *not* address the issue of processing *spoken answers to questions* using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*.

Thus, August does not disclose or suggest processing spoken answers to said one or more questions using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*, as required by independent claims 1, 9, and 16, as amended.

Arnold was also cited by the Examiner for its disclosure that, once the user has been authenticated, the automated password reset program resets the password and delivers a new password to the user in a way that further enhances the overall security of the system (paragraph [0010]). Applicants note that Arnold is directed to a "system and method for providing a password to a user using voice recognition technology." (See, Abstract.) Arnold, however, does *not* address the issue of processing *spoken answers to questions* using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*.

Thus, Arnold does not disclose or suggest processing spoken answers to said one or more questions using an automatic speech recognition technique *to determine if said spoken answer matches an answer obtained during an enrollment phase*, as required by independent claims 1, 9, and 16, as amended

Dependent Claims 2-8, 10-15 and 17-20

Dependent claims 5, 13, and 18 were rejected under 35 U.S.C. §102(e) as being anticipated by Ramaswamy et al., claims 2, 3, 6, 10, 11, 14, and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., and further in view of Honarvar et al., claims 4, 7, 12, 15, 17, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., and further in view of August, and claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy et al., and further in view of Arnold.

Claims 2-8, 10-15, and 17-20 are dependent on claims 1, 9, and 16, respectively, and are therefore patentably distinguished over Ramaswamy et al., Honarvar et al., August, and Arnold,

alone or in combination, because of their dependency from independent claims 1, 9, and 16 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

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